

ATTACHMENT B
STIPULATED ADMINISTRATIVE CIVIL LIABILITY ORDER NO. R5-2007-
MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
SAN JOAQUIN COUNTY

Musco Family Olive Company and the Studley Company (Musco) operate an olive processing wastewater treatment and land application facility (facility). The facility is regulated by Waste Discharge Requirements (WDRs) Order No. R5-2002-0148 and Cleanup and Abatement Order (CAO) No. R5-2002-0149, both of which were adopted on 6 September 2002.

Cleanup and Abatement Order No. R5-2002-0149 includes Item 4, which states that “[b]y **6 September 2004**, the Discharger shall comply with all aspects of WDRs Order No. R5-2002-0148.” As detailed below, the Discharger is in violation of both WDRs Order No. R5-2002-0148 and Cleanup and Abatement Order No. R5-2002-0149.

A review of the Discharger’s self-monitoring reports submitted for the months of September 2002 through June 2007 revealed the following violations:

1. WDRs Order No. R5-2002-0148 includes Discharge Specification B.1, which requires that “[t]he monthly average flow of wastewater and stormwater from the facility to the 1-million gallon settling pond shall not exceed 800,000 gpd.” This limitation was exceeded for October 2002 with a monthly average flow of 915,833 gpd.
2. WDRs Order No. R5-2002-0148 includes Discharge Specification B.5.a, which requires that “the wastewater from 1 to 2 feet below the surface of the 1-million and 84-million gallon ponds shall maintain...[a] dissolved oxygen concentration greater than 2 mg/l”. This requirement was violated daily in the million-gallon pond for the period of review, with the exception of 15, 18, 20, and 26 September 2002; 22, 23, 24, 26, 29, 30, and 31 December 2003; 2 January 2004, 7, 8, 9, 13, 14, 15, and 16 January 2007; and the 228 days for which no results were reported (generally weekends and holidays), for a total of 1,512 violations out of possible 1,531 monitoring events.

This requirement was violated daily in the 84-million gallon reservoir 4 November 2002 through 27 August 2003, 29 August through 7 October 2003, 13 October through 9 December 2003, 5 January through 24 February 2004, 26 February through 6 June 2004, 19 and 20 June 2004, 7 and 8 July 2004, 22 through 27 July 2004, 29 and 31 July 2004, 4 August through 30 October 2004, 5 through 20 November 2004, 10 January 2005 through 8 July 2006, 10 through 21 July 2006, 24 through 28 July 2006, 31 July through 6 August 2006, 9 through 11 August 2006, 13 and 14 August 2006, 16 through 19 August 2006, 24 through 28 August 2006, and 30 August 2006, 1 through 4 September 2006, 6 through 29 September 2006, 2 to 6 October 2006, 9 through 20 October 2006, 23 through 27 October 2006, 30 October to 3 November 2006, 6 through 10 November 2006, 14 and 16 November 2006, 20 and 21 November 2006, 27 and 28 November 2006, 18 through 21 December 2006, 5 and 28 February 2007, 13 and 28 March 2007, 27 April 2007, 7 May 2007, 11 and 12 June 2007, 20 June 2007, and 25 through 29 June 2007 for a total of 1,192 violations out of a possible 1,494 monitoring events.

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3. WDRs Order No. R5-2002-0148 includes Discharge Specification B.5.b, which requires that "*the wastewater from 1 to 2 feet below the surface of the 1-million and 84-million gallon ponds shall maintain...[a] dissolved sulfide concentration less than 0.1 mg/l*".

- a. This requirement was violated in the million-gallon reservoir on 265 occasions, out of a possible 1,509 monitoring events, as shown in the following table:

Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)
19-Sep-2002	0.15	6-Dec-2004	0.61	18-Sep-2006	0.34
20-Sep-2002	0.18	10-Dec-2004	0.90	20-Sep-2006	0.25
23-Sep-2002	0.27	16-Dec-2004	0.17	21-Sep-2006	0.11
24-Sep-2002	0.24	17-Dec-2004	0.31	23-Sep-2006	0.60
29-Sep-2002	0.21	3-Feb-2005	0.20	25-Sep-2006	0.12
10-Oct-2002	0.37	6-Feb-2005	0.32	27-Sep-2006	0.26
16-Oct-2002	0.21	7-Feb-2005	0.18	28-Sep-2006	0.72
12-Dec-2002	0.14	8-Feb-2005	0.76	29-Sep-2006	0.42
26-Dec-2002	0.19	12-Feb-2005	0.30	2-Oct-2006	0.54
3-Jan-2003	0.12	19-Feb-2005	0.43	4-Oct-2006	0.51
13-Jan-2003	0.18	22-Feb-2005	0.28	5-Oct-2006	0.93
29-Jan-2003	0.11	23-Feb-2005	0.18	6-Oct-2006	1.10
5-Feb-2003	0.11	28-Feb-2005	0.19	11-Oct-2006	0.11
28-Apr-2003	0.13	4-Mar-2005	0.38	13-Oct-2006	1.17
16-May-2003	0.12	6-Mar-2005	1.25	15-Oct-2006	0.28
15-Jul-2003	0.21	7-Mar-2005	0.30	16-Oct-2006	0.40
21-Jul-2003	0.61	9-Mar-2005	0.19	17-Oct-2006	0.21
22-Jul-2003	0.82	13-Mar-2005	0.20	19-Oct-2006	0.41
23-Jul-2003	0.83	14-Mar-2005	0.19	20-Oct-2006	0.32
24-Jul-2003	0.74	15-Mar-2005	0.32	25-Oct-2006	0.26
25-Jul-2003	>1.5	18-Mar-2005	0.18	26-Oct-2006	0.16
28-Jul-2003	0.20	19-Mar-2005	0.48	27-Oct-2006	0.30
31-Jul-2003	0.11	20-Mar-2005	0.13	31-Oct-2006	0.21
4-Aug-2003	0.22	21-Mar-2005	0.20	2-Nov-2006	0.12
5-Aug-2003	0.21	23-Mar-2005	0.11	6-Nov-2006	0.67
8-Aug-2003	0.14	2-Apr-2005	0.15	7-Nov-2006	0.16
13-Aug-2003	0.13	3-Apr-2005	0.15	9-Nov-2006	0.34
19-Aug-2003	0.11	9-Apr-2005	0.13	10-Nov-2006	0.22
27-Aug-2003	0.56	10-Apr-2005	0.49	17-Nov-2006	0.22
28-Aug-2003	0.11	11-Apr-2005	0.41	20-Nov-2006	0.16
3-Sep-2003	0.16	17-Apr-2005	0.26	22-Nov-2006	0.63
4-Sep-2003	0.15	18-Apr-2005	0.18	8-Dec-2006	0.18
11-Sep-2003	0.14	19-Apr-2005	0.16	12-Dec-2006	1.32
19-Sep-2003	0.30	20-Apr-2005	0.11	13-Dec-2006	0.13
25-Sep-2003	0.31	6-Aug-2005	0.11	14-Dec-2006	0.23
29-Sep-2003	0.15	7-Sep-2005	0.11	16-Dec-2006	0.41
6-Oct-2003	0.15	8-May-2006	0.15	1-Feb-2007	0.96
8-Oct-2003	0.15	25-May-2006	0.21	9-Feb-2007	0.96
23-Oct-2003	0.18	3-Jun-2006	0.14	12-Feb-2007	0.80
31-Mar-2004	0.20	6-Jun-2006	0.11	13-Feb-2007	0.31

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Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)
7-Apr-2004	0.15	8-Jun-2006	0.18	15-Feb-2007	0.19
1-May-2004	0.13	18-Jun-2006	0.42	17-Feb-2007	0.12
8-May-2004	0.19	27-Jun-2006	0.19	18-Feb-2007	0.21
30-May-2004	1.32	28-Jun-2006	1.36	19-Feb-2007	0.19
5-Jun-2004	0.27	29-Jun-2006	0.54	28-Feb-2007	0.33
12-Jun-2004	0.36	30-Jun-2006	0.34	9-Mar-2007	0.31
23-Jun-2004	0.26	3-Jul-2006	0.21	13-Mar-2007	0.14
25-Jun-2004	0.61	4-Jul-2006	0.11	14-Mar-2007	0.14
29-Jun-2004	0.76	6-Jul-2006	0.20	15-Mar-2007	0.67
30-Jun-2004	1.03	7-Jul-2006	1.10	16-Mar-2007	0.63
1-Jul-2004	0.70	8-Jul-2006	0.28	17-Mar-2007	0.75
2-Jul-2004	0.85	10-Jul-2006	1.34	18-Mar-2007	0.65
5-Jul-2004	1.03	11-Jul-2006	0.34	20-Mar-2007	0.29
6-Jul-2004	0.50	13-Jul-2006	0.24	21-Mar-2007	0.38
7-Jul-2004	0.18	14-Jul-2006	0.67	22-Mar-2007	0.19
8-Jul-2004	0.16	15-Jul-2006	0.45	26-Mar-2007	0.16
9-Jul-2004	0.18	17-Jul-2006	1.33	31-Mar-2007	0.16
14-Jul-2004	0.32	18-Jul-2006	0.24	5-Apr-2007	1.00
16-Jul-2004	0.83	19-Jul-2006	0.65	11-Apr-2007	0.11
17-Jul-2004	0.55	20-Jul-2006	0.12	14-Apr-2007	0.19
18-Jul-2004	0.62	21-Jul-2006	0.37	15-Apr-2007	0.12
19-Jul-2004	1.09	24-Jul-2006	0.11	16-Apr-2007	0.15
20-Jul-2004	0.67	25-Jul-2006	0.46	20-Apr-2007	0.25
21-Jul-2004	1.27	26-Jul-2006	0.47	21-Apr-2007	0.35
22-Jul-2004	0.15	31-Jul-2006	0.43	22-Apr-2007	0.27
23-Jul-2004	0.39	1-Aug-2006	0.24	28-Apr-2007	0.87
25-Jul-2004	0.43	2-Aug-2006	0.22	29-Apr-2007	0.61
26-Jul-2004	1.17	4-Aug-2006	0.15	30-Apr-2007	0.16
27-Jul-2004	0.35	5-Aug-2006	0.79	1-May-2007	0.17
28-Jul-2004	0.85	6-Aug-2006	0.28	2-May-2007	0.21
29-Jul-2004	1.09	7-Aug-2006	0.34	3-May-2007	0.34
31-Jul-2004	1.35	9-Aug-2006	0.19	4-May-2007	0.40
1-Aug-2004	0.75	14-Aug-2006	0.76	6-May-2007	0.11
3-Aug-2004	0.25	15-Aug-2006	0.12	10-May-2007	0.13
6-Aug-2004	0.62	16-Aug-2006	0.14	13-May-2007	0.12
8-Aug-2004	0.73	22-Aug-2006	0.53	18-May-2007	0.18
12-Aug-2004	0.32	23-Aug-2006	0.34	19-May-2007	0.22
14-Aug-2004	0.42	30-Aug-2006	0.34	20-May-2007	0.19
16-Aug-2004	0.11	31-Aug-2006	0.88	21-May-2007	0.17
17-Aug-2004	0.25	1-Sep-2006	0.87	22-May-2007	0.45
20-Aug-2004	0.18	2-Sep-2006	1.38	23-May-2007	0.50
21-Aug-2004	1.1	5-Sep-2006	0.38	24-May-2007	0.16
26-Aug-2004	0.45	6-Sep-2006	0.29	25-May-2007	0.49
28-Aug-2004	0.79	8-Sep-2006	0.30	16-Jun-2007	0.15
5-Sep-2004	0.11	9-Sep-2006	1.06	17-Jun-2007	0.11
28-Sep-2004	0.13	12-Sep-2006	0.37	23-Jun-2007	0.19
9-Oct-2004	1.8	13-Sep-2006	0.52	24-Jun-2007	0.16

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Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)
7-Nov-2004	0.32	16-Sep-2006	0.18		
5-Dec-2004	0.17	17-Sep-2006	1.24		

- b. This requirement was violated in the 84-million gallon reservoir on 163 occasions, out of a possible 1,495 monitoring events, as shown in the following table:

Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)
6-Nov-2002	0.48	20-Feb-2003	0.61	19-Aug-2003	0.49
7-Nov-2002	1.39	21-Feb-2003	0.67	20-Aug-2003	0.39
8-Nov-2002	0.89	28-Feb-2003	0.12	21-Aug-2003	0.12
11-Nov-2002	1.06	3-Mar-2003	0.12	27-Aug-2003	0.15
12-Nov-2002	1.16	6-Mar-2003	0.17	29-Aug-2003	0.30
13-Nov-2002	0.16	7-Mar-2003	0.37	12-Sep-2003	0.12
14-Nov-2002	0.92	10-Mar-2003	0.43	16-Sep-2003	0.50
15-Nov-2002	1.19	11-Mar-2003	0.41	18-Sep-2003	0.31
18-Nov-2002	1.35	13-Mar-2003	0.21	19-Sep-2003	0.11
19-Nov-2002	0.52	14-Mar-2003	0.33	23-Sep-2003	0.30
21-Nov-2002	1.30	19-Mar-2003	0.15	25-Sep-2003	0.17
22-Nov-2002	0.96	20-Mar-2003	0.13	2-Oct-2003	0.11
25-Nov-2002	0.62	21-Mar-2003	0.18	7-Oct-2003	0.28
26-Nov-2002	0.37	24-Mar-2003	0.28	10-Oct-2003	0.11
27-Nov-2002	0.54	25-Mar-2003	0.15	20-Oct-2003	0.15
2-Dec-2002	0.81	31-Mar-2003	0.14	24-Oct-2003	0.22
3-Dec-2002	0.59	7-Apr-2003	0.12	2-Dec-2003	0.28
4-Dec-2002	0.17	10-Apr-2003	0.11	11-Dec-2003	0.28
5-Dec-2002	0.28	14-Apr-2003	0.18	17-May-2004	0.28
10-Dec-2002	0.20	15-Apr-2003	0.20	27-May-2004	0.34
11-Dec-2002	0.14	17-Apr-2003	0.18	9-Jun-2004	0.13
12-Dec-2002	0.28	18-Apr-2003	0.13	4-Jul-2004	0.15
13-Dec-2002	0.15	21-Apr-2003	0.12	5-Jul-2004	0.13
26-Dec-2002	0.64	23-Apr-2003	0.20	20-Jul-2004	0.23
27-Dec-2002	0.52	24-Apr-2003	0.15	21-Jul-2004	0.28
30-Dec-2002	0.31	25-Apr-2003	0.13	24-Jul-2004	0.62
2-Jan-2003	0.16	28-Apr-2003	0.22	29-Jul-2004	0.29
3-Jan-2003	0.21	8-May-2003	0.15	31-Jul-2004	0.37
13-Jan-2003	0.39	19-May-2003	0.21	5-Feb-2005	0.27
14-Jan-2003	0.36	20-May-2003	0.15	9-Feb-2005	0.28
15-Jan-2003	0.31	21-May-2003	0.28	5-Mar-2005	0.30
16-Jan-2003	0.21	22-May-2003	0.18	8-Mar-2005	0.31
17-Jan-2003	0.14	2-Jun-2003	0.15	18-Mar-2005	0.49
20-Jan-2003	0.81	3-Jun-2003	0.28	18-Apr-2005	0.15
21-Jan-2003	1.14	4-Jun-2003	0.14	23-Apr-2005	0.21
22-Jan-2003	1.02	9-Jun-2003	0.68	20-Jun-2006	0.13
23-Jan-2003	1.09	10-Jun-2003	0.51	5-Aug-2006	1.28
24-Jan-2003	1.08	11-Jun-2003	0.32	2-Sep-2006	0.14
27-Jan-2003	1.08	12-Jun-2003	0.38	10-Sep-2006	1.43

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Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)	Date	Diss. Sulfide (mg/l)
28-Jan-2003	1.23	13-Jun-2003	0.21	16-Sep-2006	1.14
29-Jan-2003	1.13	16-Jun-2003	0.14	17-Sep-2006	1.17
30-Jan-2003	1.18	17-Jun-2003	0.11	27-Nov-2006	0.26
31-Jan-2003	1.28	18-Jun-2003	0.20	28-Nov-2006	0.11
3-Feb-2003	0.91	20-Jun-2003	0.20	29-Nov-2006	0.29
4-Feb-2003	0.86	23-Jun-2003	0.14	4-Dec-2006	0.11
5-Feb-2003	0.51	27-Jun-2003	0.12	7-Dec-2006	0.17
6-Feb-2003	0.97	9-Jul-2003	0.20	8-Dec-2006	0.35
7-Feb-2003	0.98	15-Jul-2003	0.20	11-Dec-2006	0.41
10-Feb-2003	0.17	22-Jul-2003	0.20	20-Dec-2006	0.17
11-Feb-2003	0.23	31-Jul-2003	0.20	5-Jan-2007	0.26
12-Feb-2003	0.23	4-Aug-2003	0.18	10-Jan-2007	0.16
13-Feb-2003	0.31	5-Aug-2003	0.11	11-Jan-2007	0.26
14-Feb-2003	0.19	6-Aug-2003	0.13	18-Jan-2007	0.14
18-Feb-2003	0.81	7-Aug-2003	0.15		
19-Feb-2003	0.71	13-Aug-2003	0.15		

- 4. WDRs Order No. R5-2002-0148 includes Discharge Specification B.5.b, which requires that "*the wastewater from 1 to 2 feet below the surface of the 1-million and 84-million gallon ponds shall maintain...[a] pH between 7.5 and 8.5 standard pH units.*"
 - a. The minimum pond pH requirement of 7.5 was violated in the million-gallon pond on 1,286 occasions, out of a possible 1,548 monitoring events. Results for pH that did not comply with the minimum requirement of 7.5 ranged from 3.5 to 7.48.
 - b. The minimum pond pH requirement of 7.5 was violated in the 84-million gallon reservoir on 449 occasions, out of a possible 1,493 monitoring events. Results for pH that did not comply with the minimum requirement of 7.5 ranged from 1.42 to 7.49.
 - c. The maximum pond pH requirement of 8.5 was violated in the million-gallon pond on 24 occasions, out of a possible 1,548 monitoring events. Results for pH that did not comply with the maximum requirement of 8.5 ranged from 8.55 to 11.2.
 - d. The maximum pond pH requirement of 8.5 was violated in the 84-million gallon reservoir on 119 occasions, out of a possible 1,493 monitoring events. Results for pH that did not comply with the maximum requirement of 8.5 ranged from 8.51 to 9.61.
- 5. WDRs Order No. R5-2002-0148 includes Discharge Specification B.9, which requires "*[p]ond freeboard [to] never be less than two feet in any pond as measured vertically from the water surface to the upper surface of the lowest adjacent dike or levee.*"
 - a. Based on review of the DSMRs, this requirement was violated in the million-gallon pond on 32 occasions, out of a possible 1,536 monitoring events, as shown in the

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following table:

Date	Freeboard (feet)	Date	Freeboard (feet)	Date	Freeboard (feet)
28-Sep-2002	1.0	15-Oct-2002	1.0	31-Oct-2002	1.0
29-Sep-2002	1.0	16-Oct-2002	1.0	19-Jul-2006	0.00
30-Sep-2002	1.5	17-Oct-2002	1.0	20-Jul-2006	0.00
1-Oct-2002	1.0	18-Oct-2002	1.0	21-Jul-2006	0.00
2-Oct-2002	1.0	20-Oct-2002	1.5	24-Jul-2006	0.00
3-Oct-2002	1.0	21-Oct-2002	1.0	25-Jul-2006	0.00
4-Oct-2002	1.0	22-Oct-2002	1.5	26-Jul-2006	0.00
8-Oct-2002	1.0	24-Oct-2002	1.5	27-Jul-2006	0.00
10-Oct-2002	1.0	25-Oct-2002	1.0	28-Jul-2006	0.00
11-Oct-2002	1.0	28-Oct-2002	1.5	31-Jul-2006	0.00
14-Oct-2002	1.0	30-Oct-2002	1.5		

When Regional Water Board staff contacted Musco staff regarding the reported July 2006 freeboard values shown in the above table, Musco staff stated (via electronic mail) that Musco did “not have the hard copies of the raw data from when [the freeboard values] were originally recorded”, so they did not know the exact freeboard on those days. Musco staff added that they were sure that the freeboard was greater than or equal to the required two feet on those dates, because of unspecified “redundant automatic controls to prevent the pond from reaching the 2-foot freeboard mark.”

- b. This requirement was violated in the 84-million gallon reservoir on 24 occasions, out of a possible 1,475 monitoring events, as shown in the following table:

Date	Freeboard (feet)	Date	Freeboard (feet)	Date	Freeboard (feet)
2-Apr-2006	1.8	10-Apr-2006	1.75	18-Apr-2006	1.80
3-Apr-2006	1.75	11-Apr-2006	1.75	19-Apr-2006	1.85
4-Apr-2006	1.75	12-Apr-2006	1.75	20-Apr-2006	1.85
5-Apr-2006	1.75	13-Apr-2006	1.70	21-Apr-2006	1.93
6-Apr-2006	1.75	14-Apr-2006	1.70	22-Apr-2006	1.93
7-Apr-2006	1.75	15-Apr-2006	1.70	23-Apr-2006	1.93
8-Apr-2006	1.75	16-Apr-2006	1.75	24-Apr-2006	1.95
9-Apr-2006	1.75	17-Apr-2006	1.75	25-Apr-2006	1.95

6. WDRs Order No. R5-2002-0148 includes Effluent Limitation C.2, which requires “[t]he maximum total nitrogen loading to the LTUs [to] not exceed 480 lbs/ac·year, or if the crop uptake is lower, the nitrogen loading [to] not exceed the agronomic rate for the crop grown.” This requirement was violated in 2003, 2004, 2005, and 2006, as shown in the following table:

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Year	Field	N (lbs/ac-yr)	Year	Field	N (lbs/ac-yr)	Year	Field	N (lbs/ac-yr)
2003	95-16	516	2005	95-09	780	2006	95-09	1,236
2004	95-02	575		95-13	759		95-13	1,043
	95-06	516		95-14	615		95-14	920
	95-08	562		95-15	543		95-15	806
	95-09	780		95-16	789		95-16	1,273
	95-13	490		95-18	544		95-17	745
	95-14	510		95-20	583		95-18	1,421
	95-16	661	2006	95-02	1,156		95-19	561
2005	95-02	686		95-05	604		95-20	913
	95-05	519		95-06	800		North 18-1	1,186
	95-06	708		95-07	666		North 18-2	1,105
	95-06	616		95-08	809		North 18-3	769
	95-08	490						

In addition, the low density of the vegetation in the land application areas noted during recent inspections is of concern with respect to nitrogen uptake.

7. WDRs Order No. R5-2002-0148 includes Effluent Limitation C.3.a, which requires that the *"maximum BOD₅ loading to the LTUs shall not exceed...300 lbs/acre on any single day"*. This limitation was violated on the occasions described in the following table:

Field	Date	BOD (lbs/ac)	Field	Date	BOD (lbs/ac)	Field	Date	BOD (lbs/ac)
95-02	28-Jul-2003	578	95-06	24-Jul-2003	511	95-07	18-Aug-2003	401
	29-Jul-2003	578		25-Jul-2003	409	95-08	29-Jul-2003	409
	30-Jul-2003	596		26-Jul-2003	409		30-Jul-2003	422
	31-Jul-2003	596		27-Jul-2003	613		31-Jul-2003	422
	1-Aug-2003	398		28-Jul-2003	409		18-Aug-2003	486
	3-Aug-2003	398		29-Jul-2003	409	95-09	24-Jul-2003	1402
	10-Aug-2003	415		30-Jul-2003	422		25-Jul-2003	1246
	16-Aug-2003	344		31-Jul-2003	422		26-Jul-2003	623
	18-Aug-2003	687		18-Aug-2003	486		27-Jul-2003	1402
	19-Aug-2003	344	95-07	22-Jul-2003	956		28-Jul-2003	623
	25-Aug-2003	352		23-Jul-2003	1012		29-Jul-2003	623
	26-Aug-2003	352		24-Jul-2003	422		30-Jul-2003	643
95-05	28-Jul-2003	307		25-Jul-2003	337		31-Jul-2003	643
	29-Jul-2003	307		26-Jul-2003	337		1-Aug-2003	429
	30-Jul-2003	317		27-Jul-2003	506		3-Aug-2003	429
	31-Jul-2003	317		28-Jul-2003	337		10-Aug-2003	448
	18-Aug-2003	365		29-Jul-2003	337		16-Aug-2003	371
95-06	22-Jul-2003	1158		30-Jul-2003	348		18-Aug-2003	741
	23-Jul-2003	1227		31-Jul-2003	348		19-Aug-2003	371
95-09	25-Aug-2003	380	95-16	22-Jul-2003	564	95-20	17-Jul-2003	392
	26-Aug-2003	380		23-Jul-2003	597		18-Jul-2003	392

ATTACHMENT B
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 MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
 SAN JOAQUIN COUNTY

Field	Date	BOD (lbs/ac)	Field	Date	BOD (lbs/ac)	Field	Date	BOD (lbs/ac)
95-13	24-Jul-2003	1066		10-Aug-2003	429		19-Jul-2003	392
	25-Jul-2003	948		16-Aug-2003	355		20-Jul-2003	392
	26-Jul-2003	474		18-Aug-2003	710		21-Jul-2003	588
	27-Jul-2003	1066		19-Aug-2003	355		22-Jul-2003	392
	10-Aug-2003	341		25-Aug-2003	364		23-Jul-2003	415
	18-Aug-2003	564		26-Aug-2003	364	55-W	30-Jul-2003	573
95-14	16-Jul-2003	417		1-Sep-2003	306		31-Jul-2003	382
	17-Jul-2003	1042		2-Sep-2003	408	SR-E	1-Aug-2003	697
	18-Jul-2003	1042	95-17	16-Jul-2003	927	Evap-E	21-Sep-2003	1235
	19-Jul-2003	625		17-Jul-2003	496		28-Jul-2003	360
	20-Jul-2003	625		18-Jul-2003	496	N-18	13-Sep-2002	451
	22-Jul-2003	417		19-Jul-2003	827		14-May-2003	339
	23-Jul-2003	441		20-Jul-2003	827		17-May-2003	339
	18-Jul-2003	525		21-Jul-2003	496		28-May-2003	334
95-15	14-Jul-2003	744		22-Jul-2003	331		26-Jun-2003	485
	16-Jul-2003	349		23-Jul-2003	350		21-Jul-2003	442
	17-Jul-2003	873		18-Aug-2003	417		22-Jul-2003	442
	18-Jul-2003	873	95-18	15-Jul-2003	1974		23-Jul-2003	702
	19-Jul-2003	524		16-Jul-2003	496		24-Jul-2003	468
	20-Jul-2003	524		17-Jul-2003	331		25-Jul-2003	351
	21-Jul-2003	524		18-Jul-2003	496		26-Jul-2003	312
	22-Jul-2003	349		19-Jul-2003	496		2-Aug-2003	322
	23-Jul-2003	370		20-Jul-2003	496		4-Aug-2003	322
	18-Aug-2003	440		21-Jul-2003	496		8-Aug-2003	599
95-16	14-Jul-2003	1201		22-Jul-2003	331		9-Aug-2003	599
	16-Jul-2003	1410		4-Aug-2003	965		10-Aug-2003	599
	17-Jul-2003	946	95-19	15-Jul-2003	1439		16-Aug-2003	371
	18-Jul-2003	946		16-Jul-2003	362		17-Aug-2003	464
	19-Jul-2003	1410		21-Jul-2003	362		21-Aug-2003	381
	20-Jul-2003	1410		4-Aug-2003	704		22-Aug-2003	508
	21-Jul-2003	846	95-20	16-Jul-2003	588		24-Aug-2003	508

8. WDRs Order No. R5-2002-0148 includes Effluent Limitation C.3.b, which requires that the “maximum BOD_5 loading to the LTUs shall not exceed... 100 lbs/acre·day as a 7-day average”. This limitation was violated on the occasions described in the following table:

Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)
13-Sep-02	N-18	150	23-Jul-03	95-06	341	16-Aug-03	95-08	157
14-Sep-02	N-18	138	23-Jul-03	95-07	281	16-Aug-03	95-09	239
15-Sep-02	95-06	104	23-Jul-03	95-14	599	16-Aug-03	95-13	198
15-Sep-02	N-18	145	23-Jul-03	95-15	577	16-Aug-03	95-15	126
16-Sep-02	95-05	109	23-Jul-03	95-16	931	16-Aug-03	95-16	178
16-Sep-02	95-06	146	23-Jul-03	95-17	547	16-Aug-03	N-18	189
16-Sep-02	95-09	113	23-Jul-03	95-18	378	17-Aug-03	95-02	187
16-Sep-02	95-16	103	23-Jul-03	95-19	224	17-Aug-03	95-06	150

ATTACHMENT B
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 MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
 SAN JOAQUIN COUNTY

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Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)
16-Sep-02	N-18	163	23-Jul-03	95-19	424	17-Aug-03	95-07	109
17-Sep-02	95-02	121	23-Jul-03	N-18	248	17-Aug-03	95-08	132
17-Sep-02	95-03	101	24-Jul-03	95-06	414	17-Aug-03	95-09	202
17-Sep-02	95-05	141	24-Jul-03	95-07	341	17-Aug-03	95-13	169
17-Sep-02	95-06	188	24-Jul-03	95-09	200	17-Aug-03	95-15	104
17-Sep-02	95-09	137	24-Jul-03	95-13	152	17-Aug-03	95-16	117
17-Sep-02	95-16	126	24-Jul-03	95-14	450	17-Aug-03	N-18	170
17-Sep-02	N-18	168	24-Jul-03	95-15	452	18-Aug-03	95-02	265
18-Sep-02	95-02	133	24-Jul-03	95-16	810	18-Aug-03	95-03	103
18-Sep-02	95-03	101	24-Jul-03	95-17	476	18-Aug-03	95-05	141
18-Sep-02	95-05	141	24-Jul-03	95-18	331	18-Aug-03	95-06	205
18-Sep-02	95-06	188	24-Jul-03	95-19	190	18-Aug-03	95-07	155
18-Sep-02	95-09	125	24-Jul-03	95-19	368	18-Aug-03	95-08	188
18-Sep-02	95-16	114	24-Jul-03	N-18	315	18-Aug-03	95-09	286
18-Sep-02	N-18	197	25-Jul-03	95-06	472	18-Aug-03	95-13	234
19-Sep-02	95-02	121	25-Jul-03	95-07	390	18-Aug-03	95-14	169
19-Sep-02	95-03	101	25-Jul-03	95-09	378	18-Aug-03	95-15	167
19-Sep-02	95-05	141	25-Jul-03	95-13	288	18-Aug-03	95-16	218
19-Sep-02	95-06	188	25-Jul-03	95-14	301	18-Aug-03	95-17	113
19-Sep-02	95-09	125	25-Jul-03	95-15	327	18-Aug-03	N-18	159
19-Sep-02	95-16	114	25-Jul-03	95-16	689	19-Aug-03	95-02	295
19-Sep-02	N-18	222	25-Jul-03	95-17	405	19-Aug-03	95-03	113
20-Sep-02	95-02	158	25-Jul-03	95-18	260	19-Aug-03	95-04	108
20-Sep-02	95-03	110	25-Jul-03	95-19	155	19-Aug-03	95-05	156
20-Sep-02	95-05	165	25-Jul-03	95-19	312	19-Aug-03	95-06	226
20-Sep-02	95-06	204	25-Jul-03	N-18	365	19-Aug-03	95-07	172
20-Sep-02	95-09	139	26-Jul-03	95-06	531	19-Aug-03	95-08	207
20-Sep-02	95-16	128	26-Jul-03	95-07	438	19-Aug-03	95-09	318
20-Sep-02	N-18	185	26-Jul-03	95-09	467	19-Aug-03	95-13	201
21-Sep-02	95-03	118	26-Jul-03	95-13	355	19-Aug-03	95-14	169
21-Sep-02	95-05	177	26-Jul-03	95-14	212	19-Aug-03	95-15	173
21-Sep-02	95-06	221	26-Jul-03	95-15	252	19-Aug-03	95-16	228
21-Sep-02	95-07	103	26-Jul-03	95-16	488	19-Aug-03	95-17	119
21-Sep-02	95-08	109	26-Jul-03	95-17	286	19-Aug-03	95-10	109
21-Sep-02	95-09	152	26-Jul-03	95-18	189	19-Aug-03	N-18	186
21-Sep-02	95-14	104	26-Jul-03	95-19	121	20-Aug-03	95-02	270
21-Sep-02	95-16	140	26-Jul-03	95-19	255	20-Aug-03	95-03	107
21-Sep-02	95-02	182	26-Jul-03	N-18	388	20-Aug-03	95-04	102
21-Sep-02	EvapE	196	27-Jul-03	95-03	124	20-Aug-03	95-05	143
21-Sep-02	N-18	177	27-Jul-03	95-04	118	20-Aug-03	95-06	191
22-Sep-02	95-03	138	27-Jul-03	95-06	618	20-Aug-03	95-07	158
22-Sep-02	95-05	195	27-Jul-03	95-07	510	20-Aug-03	95-08	191
22-Sep-02	95-06	244	27-Jul-03	95-09	668	20-Aug-03	95-09	291
22-Sep-02	95-07	114	27-Jul-03	95-13	508	20-Aug-03	95-10	100
22-Sep-02	95-08	122	27-Jul-03	95-14	123	20-Aug-03	95-13	181
22-Sep-02	95-09	173	27-Jul-03	95-15	178	20-Aug-03	95-14	169
22-Sep-02	95-14	122	27-Jul-03	95-16	287	20-Aug-03	95-15	157

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ATTACHMENT B
 STIPULATED ADMINISTRATIVE CIVIL LIABILITY ORDER NO. R5-2007-_____
 MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
 SAN JOAQUIN COUNTY

Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)
22-Sep-02	95-15	103	27-Jul-03	95-17	168	20-Aug-03	95-16	263
22-Sep-02	95-16	165	27-Jul-03	95-18	118	20-Aug-03	95-17	139
22-Sep-02	95-02	219	27-Jul-03	95-19	199	20-Aug-03	N-18	222
22-Sep-02	Evap-E	206	27-Jul-03	N-18	411	21-Aug-03	95-02	279
22-Sep-02	N-18	176	28-Jul-03	95-03	153	21-Aug-03	95-03	111
23-Sep-02	95-03	132	28-Jul-03	95-04	146	21-Aug-03	95-04	105
23-Sep-02	95-05	186	28-Jul-03	95-06	677	21-Aug-03	95-05	148
23-Sep-02	95-06	233	28-Jul-03	95-07	558	21-Aug-03	95-06	197
23-Sep-02	95-07	108	28-Jul-03	95-09	757	21-Aug-03	95-07	163
23-Sep-02	95-08	116	28-Jul-03	95-13	508	21-Aug-03	95-08	197
23-Sep-02	95-09	163	28-Jul-03	95-14	123	21-Aug-03	95-09	301
23-Sep-02	95-14	116	28-Jul-03	95-15	103	21-Aug-03	95-10	103
23-Sep-02	95-16	156	28-Jul-03	95-19	115	21-Aug-03	95-13	161
23-Sep-02	95-02	210	28-Jul-03	95-16	166	21-Aug-03	95-14	150
23-Sep-02	Evap-E	209	28-Jul-03	N-18	347	21-Aug-03	95-15	179
23-Sep-02	N-18	144	29-Jul-03	95-02	165	21-Aug-03	95-16	298
24-Sep-02	95-03	134	29-Jul-03	95-03	183	21-Aug-03	95-17	160
24-Sep-02	95-05	178	29-Jul-03	95-04	174	21-Aug-03	N-18	276
24-Sep-02	95-06	222	29-Jul-03	95-06	569	22-Aug-03	95-02	271
24-Sep-02	95-07	103	29-Jul-03	95-07	470	22-Aug-03	95-03	108
24-Sep-02	95-08	117	29-Jul-03	95-09	846	22-Aug-03	95-04	103
24-Sep-02	95-09	165	29-Jul-03	95-13	508	22-Aug-03	95-05	144
24-Sep-02	95-13	108	29-Jul-03	N-18	284	22-Aug-03	95-06	192
24-Sep-02	95-14	117	30-Jul-03	95-02	250	22-Aug-03	95-07	158
24-Sep-02	95-16	159	30-Jul-03	95-03	213	22-Aug-03	95-08	192
24-Sep-02	95-19	103	30-Jul-03	95-04	203	22-Aug-03	95-09	293
24-Sep-02	95-02	213	30-Jul-03	95-05	133	22-Aug-03	95-10	101
24-Sep-02	Evap-E	214	30-Jul-03	95-06	455	22-Aug-03	95-13	141
24-Sep-02	N-18	131	30-Jul-03	95-07	375	22-Aug-03	95-14	131
25-Sep-02	95-03	121	30-Jul-03	95-08	119	22-Aug-03	95-15	174
25-Sep-02	95-05	155	30-Jul-03	95-09	937	22-Aug-03	95-16	290
25-Sep-02	95-06	191	30-Jul-03	95-13	508	22-Aug-03	95-17	170
25-Sep-02	95-08	108	30-Jul-03	55-W	124	22-Aug-03	N-18	309
25-Sep-02	95-09	151	30-Jul-03	Evap-E	104	23-Aug-03	95-02	239
25-Sep-02	95-13	115	30-Jul-03	N-18	184	23-Aug-03	95-05	127
25-Sep-02	95-14	107	31-Jul-03	95-02	335	23-Aug-03	95-06	169
25-Sep-02	95-16	145	31-Jul-03	95-03	206	23-Aug-03	95-07	140
25-Sep-02	95-02	193	31-Jul-03	95-04	197	23-Aug-03	95-08	169
25-Sep-02	Evap-E	217	31-Jul-03	95-05	178	23-Aug-03	95-09	258
25-Sep-02	N-18	114	31-Jul-03	95-06	442	23-Aug-03	95-13	101
26-Sep-02	95-03	116	31-Jul-03	95-07	365	23-Aug-03	95-15	153
26-Sep-02	95-05	142	31-Jul-03	95-08	179	23-Aug-03	95-16	274
26-Sep-02	95-06	175	31-Jul-03	95-09	829	23-Aug-03	95-17	161
26-Sep-02	95-09	137	31-Jul-03	95-10	124	23-Aug-03	N-18	256
26-Sep-02	95-13	104	31-Jul-03	95-13	355	24-Aug-03	95-02	231
26-Sep-02	95-16	131	31-Jul-03	55-W	179	24-Aug-03	95-05	123
26-Sep-02	95-02	184	31-Jul-03	Evap-E	104	24-Aug-03	95-06	164

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ATTACHMENT B
 STIPULATED ADMINISTRATIVE CIVIL LIABILITY ORDER NO. R5-2007-_____
 MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
 SAN JOAQUIN COUNTY

Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)
26-Sep-02	Evap-E	212	31-Jul-03	N-18	117	24-Aug-03	95-07	135
27-Sep-02	95-03	101	1-Aug-03	95-02	392	24-Aug-03	95-08	164
27-Sep-02	95-05	116	1-Aug-03	95-03	197	24-Aug-03	95-09	249
27-Sep-02	95-06	155	1-Aug-03	95-04	188	24-Aug-03	95-15	148
27-Sep-02	95-09	120	1-Aug-03	95-05	208	24-Aug-03	95-16	308
27-Sep-02	95-16	115	1-Aug-03	95-06	424	24-Aug-03	95-17	181
27-Sep-02	95-02	161	1-Aug-03	95-07	350	24-Aug-03	N-18	262
27-Sep-02	Evap-E	201	1-Aug-03	95-08	219	25-Aug-03	95-02	183
28-Sep-02	95-05	102	1-Aug-03	95-08	130	25-Aug-03	95-06	130
28-Sep-02	95-06	136	1-Aug-03	95-09	712	25-Aug-03	95-07	107
28-Sep-02	95-09	116	1-Aug-03	95-10	145	25-Aug-03	95-08	130
28-Sep-02	95-16	111	1-Aug-03	95-13	220	25-Aug-03	95-09	198
28-Sep-02	95-02	149	1-Aug-03	55-W	206	25-Aug-03	95-15	117
29-Sep-02	95-06	116	1-Aug-03	95-02	177	25-Aug-03	95-16	259
29-Sep-02	95-02	126	1-Aug-03	Evap-E	110	25-Aug-03	95-17	152
30-Sep-02	95-02	111	1-Aug-03	SR-E	121	25-Aug-03	N-18	299
03-Oct-02	95-06	104	2-Aug-03	95-02	392	26-Aug-03	95-02	185
04-Oct-02	95-06	117	2-Aug-03	95-02	148	26-Aug-03	95-06	131
04-Oct-02	95-09	101	2-Aug-03	95-03	168	26-Aug-03	95-07	108
05-Oct-02	95-06	106	2-Aug-03	95-04	160	26-Aug-03	95-08	131
07-Oct-02	95-06	109	2-Aug-03	95-05	208	26-Aug-03	95-09	199
08-Oct-02	95-06	122	2-Aug-03	95-06	365	26-Aug-03	95-15	118
08-Oct-02	95-09	105	2-Aug-03	95-07	301	26-Aug-03	95-16	260
09-Oct-02	95-06	105	2-Aug-03	95-08	219	26-Aug-03	95-17	125
14-Oct-02	N-18	110	2-Aug-03	95-08	130	26-Aug-03	N-18	308
15-Oct-02	N-18	114	2-Aug-03	95-09	623	27-Aug-03	95-02	206
16-Oct-02	N-18	140	2-Aug-03	95-10	145	27-Aug-03	95-05	109
17-Oct-02	N-18	135	2-Aug-03	95-13	152	27-Aug-03	95-06	146
18-Oct-02	N-18	110	2-Aug-03	55-W	219	27-Aug-03	95-07	120
19-Oct-02	N-18	102	2-Aug-03	Evap-E	110	27-Aug-03	95-08	146
27-Oct-02	55-W	116	2-Aug-03	SR-E	134	27-Aug-03	95-09	222
28-Oct-02	55-W	114	3-Aug-03	95-01	108	27-Aug-03	95-15	132
29-Oct-02	95-06	105	3-Aug-03	95-02	449	27-Aug-03	95-16	247
29-Oct-02	55-W	121	3-Aug-03	95-02	129	27-Aug-03	95-17	118
30-Oct-02	95-02	101	3-Aug-03	95-03	159	27-Aug-03	N-18	287
30-Oct-02	95-06	127	3-Aug-03	95-04	151	28-Aug-03	95-02	193
30-Oct-02	55-W	139	3-Aug-03	95-05	210	28-Aug-03	95-05	103
31-Oct-02	95-06	117	3-Aug-03	95-06	318	28-Aug-03	95-06	137
31-Oct-02	55-W	181	3-Aug-03	95-07	262	28-Aug-03	95-07	113
1-Nov-02	55-W	154	3-Aug-03	95-08	259	28-Aug-03	95-09	209
2-Nov-02	55-W	123	3-Aug-03	95-08	117	28-Aug-03	95-15	124
17-May-03	N-18	123	3-Aug-03	95-09	484	28-Aug-03	95-16	235
18-May-03	N-18	147	3-Aug-03	95-10	167	28-Aug-03	95-17	110
19-May-03	N-18	140	3-Aug-03	55-W	247	28-Aug-03	95-08	137
20-May-03	55-W	114	3-Aug-03	Evap-E	134	28-Aug-03	N-18	244
20-May-03	N-18	155	3-Aug-03	SR-E	134	29-Aug-03	95-02	198
21-May-03	55-W	139	4-Aug-03	95-02	395	29-Aug-03	95-05	105

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ATTACHMENT B
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 MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
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Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)
21-May-03	N-18	123	4-Aug-03	95-02	109	29-Aug-03	9506	125
22-May-03	55-W	123	4-Aug-03	9503	140	29-Aug-03	9507	116
22-May-03	N-18	130	4-Aug-03	9504	133	29-Aug-03	9508	140
23-May-03	55-W	134	4-Aug-03	9505	210	29-Aug-03	9509	213
23-May-03	N-18	155	4-Aug-03	9506	280	29-Aug-03	9515	127
24-May-03	55-W	114	4-Aug-03	9507	231	29-Aug-03	9516	239
24-May-03	N-18	107	4-Aug-03	9508	280	29-Aug-03	9517	113
25-May-03	55-W	111	4-Aug-03	9508	104	29-Aug-03	N18	185
26-May-03	95-02	104	4-Aug-03	9509	426	30-Aug-03	9502	202
26-May-03	95-09	112	4-Aug-03	9510	146	30-Aug-03	9505	107
26-May-03	55-W	103	4-Aug-03	9518	138	30-Aug-03	9506	113
27-May-03	95-02	102	4-Aug-03	9519	101	30-Aug-03	9507	118
27-May-03	95-09	110	4-Aug-03	55W	253	30-Aug-03	9508	143
27-May-03	N-18	102	4-Aug-03	EvapE	106	30-Aug-03	9509	218
28-May-03	95-02	108	4-Aug-03	SRE	134	30-Aug-03	9515	129
28-May-03	95-09	117	5-Aug-03	9502	341	30-Aug-03	9516	226
28-May-03	N-18	133	5-Aug-03	9503	121	30-Aug-03	9517	105
29-May-03	95-02	112	5-Aug-03	9505	181	30-Aug-03	N18	191
29-May-03	95-09	121	5-Aug-03	9506	241	31-Aug-03	9502	206
29-May-03	N-18	123	5-Aug-03	9507	199	31-Aug-03	9506	101
30-May-03	95-02	116	5-Aug-03	9508	241	31-Aug-03	9507	121
30-May-03	95-09	125	5-Aug-03	9509	368	31-Aug-03	9508	146
30-May-03	N-18	106	5-Aug-03	9510	126	31-Aug-03	9509	223
31-May-03	95-02	123	5-Aug-03	9518	155	31-Aug-03	9515	132
31-May-03	95-09	133	5-Aug-03	9519	113	31-Aug-03	9516	213
31-May-03	N-18	114	5-Aug-03	55W	266	31-Aug-03	95-05	110
01-Jun-03	95-02	130	5-Aug-03	95-04	115	31-Aug-03	N18	149
01-Jun-03	95-09	124	5-Aug-03	SRE	124	1-Sep-03	9507	108
01-Jun-03	N-18	113	6-Aug-03	9502	295	1-Sep-03	9509	206
01-Jun-03	Spur-N	106	6-Aug-03	9503	104	1-Sep-03	9515	114
02-Jun-03	95-02	126	6-Aug-03	9505	157	1-Sep-03	9516	205
02-Jun-03	95-09	104	6-Aug-03	9506	209	1-Sep-03	N18	116
02-Jun-03	N-18	113	6-Aug-03	9507	172	2-Sep-03	9509	175
03-Jun-03	95-02	125	6-Aug-03	9508	209	2-Sep-03	9515	108
03-Jun-03	55-W	101	6-Aug-03	9509	318	2-Sep-03	9516	211
03-Jun-03	N-18	119	6-Aug-03	9510	109	2-Sep-03	9517	124
04-Jun-03	95-02	122	6-Aug-03	9518	179	3-Sep-03	9509	155
04-Jun-03	55-W	106	6-Aug-03	9519	131	3-Sep-03	9516	195
05-Jun-03	95-02	118	6-Aug-03	55W	198	3-Sep-03	9517	115
05-Jun-03	N-18	106	6-Aug-03	SRE	142	4-Sep-03	9509	134
10-Jun-03	N-18	105	7-Aug-03	9502	250	4-Sep-03	9516	179
11-Jun-03	N-18	101	7-Aug-03	9505	132	4-Sep-03	9517	105
13-Jun-03	N-18	110	7-Aug-03	9507	146	5-Sep-03	9509	115
14-Jun-03	N-18	110	7-Aug-03	9508	177	5-Sep-03	9516	167
15-Jun-03	N-18	110	7-Aug-03	9509	269	6-Sep-03	9516	152
27-Jun-03	N-18	107	7-Aug-03	9513	111	7-Sep-03	9516	138
28-Jun-03	N-18	120	7-Aug-03	9518	179	8-Sep-03	9516	104

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Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)
29-Jun-03	N-18	151	7-Aug-03	9519	131	8-Sep-05	9502	100
30-Jun-03	N-18	151	7-Aug-03	55W	144	8-Sep-05	9506	127
30-Jun-03	SRE	133	7-Aug-03	95-06	177	8-Sep-05	9507	105
30-Jun-03	SRW	128	7-Aug-03	N18	135	8-Sep-05	9509	108
1-Jul-03	N-18	189	7-Aug-03	SRE	142	8-Sep-05	9516	104
1-Jul-03	SpurN	108	8-Aug-03	9502	213	9-Sep-05	9502	105
1-Jul-03	SRE	153	8-Aug-03	9505	113	9-Sep-05	9505	104
1-Jul-03	SRW	148	8-Aug-03	9506	150	9-Sep-05	9506	139
2-Jul-03	N-18	189	8-Aug-03	9507	124	9-Sep-05	9509	113
2-Jul-03	SRE	150	8-Aug-03	9508	150	9-Sep-05	9516	108
2-Jul-03	SRW	144	8-Aug-03	9513	128	9-Sep-05	95-07	115
3-Jul-03	N-18	120	8-Aug-03	9518	179	10-Sep-05	9505	102
3-Jul-03	SRE	141	8-Aug-03	9519	131	10-Sep-05	9506	136
3-Jul-03	SRW	120	8-Aug-03	55W	117	10-Sep-05	9507	113
4-Jul-03	SRE	131	8-Aug-03	95-09	229	10-Sep-05	9509	106
4-Jul-03	SRW	110	8-Aug-03	N18	220	10-Sep-05	9516	101
5-Jul-03	SRE	127	9-Aug-03	9502	232	11-Sep-05	9502	115
5-Jul-03	SRW	106	9-Aug-03	9505	123	11-Sep-05	9505	114
6-Jul-03	SRE	123	9-Aug-03	9506	164	11-Sep-05	9506	152
6-Jul-03	SRW	103	9-Aug-03	9507	124	11-Sep-05	9507	126
12-Jul-03	Past	111	9-Aug-03	9508	150	11-Sep-05	9509	124
13-Jul-03	Past	111	9-Aug-03	9509	229	11-Sep-05	9516	119
14-Jul-03	95-15	106	9-Aug-03	9513	128	12-Sep-05	9502	120
14-Jul-03	95-16	172	9-Aug-03	9518	179	12-Sep-05	9505	120
14-Jul-03	Past	101	9-Aug-03	9519	131	12-Sep-05	9506	160
14-Jul-03	SRE	105	9-Aug-03	55W	103	12-Sep-05	9507	132
14-Jul-03	SRW	102	9-Aug-03	N18	260	12-Sep-05	9509	130
15-Jul-03	95-15	106	10-Aug-03	9502	235	12-Sep-05	9516	124
15-Jul-03	95-16	172	10-Aug-03	9505	125	13-Sep-05	9502	112
15-Jul-03	95-18	282	10-Aug-03	9506	166	13-Sep-05	9505	110
15-Jul-03	95-19	206	10-Aug-03	9507	126	13-Sep-05	9506	146
15-Jul-03	SRE	120	10-Aug-03	9508	152	13-Sep-05	9507	121
15-Jul-03	SRW	116	10-Aug-03	9509	232	13-Sep-05	9509	121
16-Jul-03	95-15	156	10-Aug-03	9513	176	13-Sep-05	9516	116
16-Jul-03	95-16	373	10-Aug-03	9515	138	14-Sep-05	9502	103
16-Jul-03	95-17	118	10-Aug-03	9516	123	14-Sep-05	9506	133
16-Jul-03	95-18	353	10-Aug-03	9518	179	14-Sep-05	9507	110
16-Jul-03	95-19	257	10-Aug-03	9519	131	14-Sep-05	9509	111
16-Jul-03	SRE	120	10-Aug-03	N18	345	14-Sep-05	9516	106
16-Jul-03	SRW	116	11-Aug-03	9502	226	15-Sep-05	9506	120
17-Jul-03	95-14	208	11-Aug-03	9505	120	15-Sep-05	9509	101
17-Jul-03	95-15	281	11-Aug-03	9506	160	16-Sep-05	9506	120
17-Jul-03	95-16	494	11-Aug-03	9507	121	16-Sep-05	9509	104
17-Jul-03	95-17	189	11-Aug-03	9508	146	16-Sep-05	9516	100
17-Jul-03	95-18	400	11-Aug-03	9509	223	17-Sep-05	9506	124
17-Jul-03	95-19	292	11-Aug-03	9513	169	17-Sep-05	9507	102
17-Jul-03	95-20	140	11-Aug-03	9515	120	17-Sep-05	9509	107

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Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)	Date of Seventh Day	Field	Ave. BOD (lbs/ac-day)
17-Jul-03	SRE	102	11-Aug-03	9516	123	17-Sep-05	9516	103
18-Jul-03	95-14	357	11-Aug-03	N18	310	18-Sep-05	9506	121
18-Jul-03	95-15	406	12-Aug-03	9502	218	19-Sep-05	9506	103
18-Jul-03	95-16	615	12-Aug-03	9505	116	20-Sep-05	9506	110
18-Jul-03	95-17	260	12-Aug-03	9506	154	21-Sep-05	9506	110
18-Jul-03	95-18	471	12-Aug-03	9507	116	22-Sep-05	9506	115
18-Jul-03	95-19	326	12-Aug-03	9508	140	23-Sep-05	9506	112
18-Jul-03	95-19	196	12-Aug-03	9509	213	24-Sep-05	9506	114
19-Jul-03	95-14	447	12-Aug-03	9513	178	25-Sep-05	9506	106
19-Jul-03	9515	481	12-Aug-03	9515	127	26-Sep-05	9506	114
19-Jul-03	9516	816	12-Aug-03	9516	164	27-Sep-05	9506	109
19-Jul-03	9517	378	12-Aug-03	N18	310	28-Sep-05	9506	101
19-Jul-03	9518	542	13-Aug-03	9502	203	12-Oct-05	9513	106
19-Jul-03	9519	361	13-Aug-03	9505	108	13-Oct-05	9513	123
19-Jul-03	9519	252	13-Aug-03	9506	161	14-Oct-05	9513	113
19-Jul-03	N18	111	13-Aug-03	9507	107	15-Oct-05	9513	113
20-Jul-03	9514	536	13-Aug-03	9508	129	16-Oct-05	9513	112
20-Jul-03	9515	555	13-Aug-03	9509	197	17-Oct-05	9513	127
20-Jul-03	9516	1017	13-Aug-03	9513	166	18-Oct-05	9513	132
20-Jul-03	9517	496	13-Aug-03	9516	164	19-Oct-05	9513	137
20-Jul-03	9518	613	13-Aug-03	95-15	117	20-Oct-05	9507	102
20-Jul-03	9519	395	13-Aug-03	N18	310	20-Oct-05	9513	131
20-Jul-03	9519	308	14-Aug-03	9502	188	21-Oct-05	9507	105
20-Jul-03	N18	102	14-Aug-03	9506	150	21-Oct-05	9513	138
21-Jul-03	9514	536	14-Aug-03	9508	119	22-Oct-05	9507	117
21-Jul-03	9515	524	14-Aug-03	9509	181	22-Oct-05	9513	164
21-Jul-03	9516	967	14-Aug-03	9513	154	23-Oct-05	9507	120
21-Jul-03	9518	684	14-Aug-03	9516	123	23-Oct-05	9513	168
21-Jul-03	9519	447	14-Aug-03	N18	267	24-Oct-05	9507	112
21-Jul-03	9519	392	15-Aug-03	9502	192	24-Oct-05	95-13	149
21-Jul-03	95-17	567	15-Aug-03	9505	102	25-Oct-05	9513	139
21-Jul-03	N18	125	15-Aug-03	9506	154	26-Oct-05	9513	119
22-Jul-03	9506	165	15-Aug-03	9507	101	27-Oct-05	9513	111
22-Jul-03	9507	137	15-Aug-03	9508	122	28-Oct-05	9513	101
22-Jul-03	9514	595	15-Aug-03	9509	186	15-Jul-06	9516	104
22-Jul-03	9515	574	15-Aug-03	9513	158	15-Jul-06	9518	104
22-Jul-03	9516	1047	15-Aug-03	9516	128	16-Jul-06	9516	102
22-Jul-03	9517	615	15-Aug-03	N18	222	16-Jul-06	9518	102
22-Jul-03	9518	449	16-Aug-03	9502	222			
22-Jul-03	9519	276	16-Aug-03	9505	118			
22-Jul-03	9519	448	16-Aug-03	9506	174			
22-Jul-03	N18	147	16-Aug-03	9507	129			

9. WDRs Order No. R5-2002-0148 includes Effluent Limitation C.4, which requires “[w]astewater discharged to the LTUs [to] not have a pH of less than 6.5 or greater than 8.5.” Since wastewater discharged to the land application areas is from the 84-million

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gallon reservoir, pH values from this reservoir were used in assessing compliance with Effluent Limitation C.4.

- a. The minimum pH requirement of 6.5 was violated in the 84-million gallon pond on four occasions, out of 894 days with both discharge to the LTUs and monitoring of pH in the 84-million gallon reservoir, as shown in the following table:

Date	pH	Discharge to LTUs (millions of gallons)	Date	pH	Discharge to LTUs (millions of gallons)
20-Mar-2003	6.47	0.288873	14-Oct-2006	6.49	0.010260
25-Mar-2003	6.28	0.260892	20-Jan-2007	5.55	0.225045

- b. The maximum pH requirement of 8.5 was violated in the 84-million gallon reservoir on 40 occasions, out of approximately 894 days with both discharge to the LTUs and monitoring of pH in the 84-million gallon pond, as shown in the following table:

Date	pH	Discharge to LTUs (millions of gallons)	Date	pH	Discharge to LTUs (millions of gallons)
29-Jan-2003	8.66	0.227138	15-May-2007	8.57	0.754172
29-Jun-2004	8.60	1.019056	21-May-2007	8.72	0.692872
7-Jul-2004	8.51	0.858549	22-May-2007	8.52	0.811680
13-Jul-2004	8.76	1.017497	23-May-2007	8.65	0.879183
26-Jul-2004	8.57	0.996520	24-May-2007	8.62	0.608268
29-Jul-2004	8.51	1.021561	25-May-2007	8.57	0.944749
20-Aug-2004	8.52	0.927826	26-May-2007	8.68	1.051080
3-Oct-2004	8.45	0.542143	27-May-2007	8.57	1.322146
1-Aug-2006	8.86	1.622416	28-May-2007	8.65	0.982763
5-Aug-2006	8.84	1.356837	29-May-2007	8.78	0.885090
7-Aug-2006	8.69	1.545162	30-May-2007	8.65	0.921751
9-Aug-2006	8.51	2.406292	31-May-2007	8.64	1.023146
10-Aug-2006	9.43	2.212156	1-Jun-2007	8.84	0.790193
13-Aug-2006	9.61	2.235066	2-Jun-2007	8.74	0.931403
18-Aug-2006	8.67	1.358656	3-Jun-2007	8.82	0.895366
21-Aug-2006	8.60	1.661688	4-Jun-2007	8.80	0.762507
25-Aug-2006	8.52	2.106707	5-Jun-2007	8.90	0.904671
28-Aug-2006	8.57	1.886018	7-Jun-2007	8.82	0.984979
8-May-2007	8.51	0.981971	9-Jun-2007	8.76	0.003386
14-May-2007	8.51	0.897696	10-Jun-2007	8.61	0.003386

- 10. WDRs Order No. R5-2002-0148 includes Land Application Area Specification D.7, which requires that “[i]rrigation with process wastewater shall not be performed within 24 hours of a forecasted storm, during a precipitation event, 24 hours after a precipitation event, or when the ground is saturated.” This requirement was violated on at least 59 occasions during the period reviewed, as shown in the following table:

Date	Precip. (in)	Precip. Hours	Irrigation Duration (hours)	Date	Precip. (in)	Precip. Hours	Irrigation Duration (hours)

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Date	Precip. (in)	Precip. Hours	Irrigation Duration (hours)	Date	Precip. (in)	Precip. Hours	Irrigation Duration (hours)
27-Dec-2002	0.00	--	6.5	19-Sep-2004	0.53	0600-1100	2.25
28-Dec-2002	0.14	1300-1900	--	3-Apr-2005	0.14	1800-2300	0.5
26-Feb-2003	0.13	2200-2400	4.0	4-Apr-2005	0.00	--	0.5
31-Mar-2003	0.00	--	5.0	8-Apr-2005	0.12	0800-1100	0.5
1-Apr-2003	0.03	0800-1100	--	27-Apr-2005	0.08	1200-2000	1.0
20-Aug-2003	0.00	--	4.0	28-Apr-2005	0.95	0100-1400	--
21-Aug-2003	0.01	0900-1000	6.0	29-Apr-2005	0.00	--	1.0
22-Aug-2003	0.02	0100-0200	8.0	4-May-2005	0.15	1900-2400	1.0
25-Aug-2003	0.00	--	4.0	5-May-2005	0.07	2400-0800	--
26-Aug-2003	0.04	0200-0300	4.0	7-Jun-2005	0.00	--	2.0
2-Nov-2003	0.08	2100-2300	1.0	8-Jun-2005	0.06	0400-0800	--
3-Nov-2003	0.17	2400-0200	--	16-Jun-2005	0.03	1700-1800	1.5
6-Nov-2003	0.02	2300-2400	1	17-Jun-2005	0.00	--	4.0
1-Jan-2004	0.58	1200-1300	0.5	28-Nov-2005	0.39	1800-2200	1.5
6-Jan-2004	0.13	1900-2300	0.25	29-Nov-2005	0.01	0500-0600	--
7-Jan-2004	0.05	2400-1500	--	7-Dec-2005	0.03	1700-2200	1.5
14-Jan-2004	0.01	1300-1400	0.5	17-Feb-2006	0.11	1500-1700	1.5
26-Jan-2004	0.01	2000-2100	0.5	27-Mar-2006	0.27	1500-1800	0.5
27-Jan-2004	0.04	1600-1700	--	30-Mar-2006	0.01	1800-1900	1.25
28-Jan-2004	0.00	--	0.5	31-Mar-2006	0.07	1400-1900	0.5
2-Feb-2004	0.41	1000-1500	2.0	7-Apr-2006	0.07	1500-1600	0.5
3-Feb-2004	0.19	0200-2000	--	21-Apr-2006	0.08	1400-1500	1.0
6-Feb-2004	0.03	2000-2200	1.25	21-May-2006	0.28	--	1.0
7-Feb-2004	0.00	--	3.0	22-May-2006	0.33	0100-0400	--
15-Feb-2004	0.00	--	1.5	1-Oct-2006	0.04	1500-1600	4.66
16-Feb-2004	0.24	0100-0700	--	2-Oct-2006	0.00	--	2.66
17-Feb-2004	0.20	2000-2400	1.75	4-Oct-2006	0.01	2300-2400	--
18-Feb-2004	0.21	2400-0700	--	5-Oct-2006	0.01	0100-0200	2.0
19-Feb-2004	0.00	--	1.0	26-Jan-2007	0.00	--	1.0
20-Feb-2004	0.01	2400-0100	0.5	27-Jan-2007	0.04	0100-1400	--
21-Feb-2004	0.08	1400-2100	1.0	28-Jan-2007	0.02	0100-0300	1.0
22-Feb-2004	0.25	0300-2000	--	21-Feb-2007	0.00	--	7.0
25-Mar-2004	0.04	1700-1900	3.5	22-Feb-2007	0.21	0500-0900	--
26-Mar-2004	0.00	--	3.5	26-Mar-2007	0.06	1200-1800	1.0
16-Apr-2004	0.00	--	1.0	10-Apr-2007	0.00	--	2.5
17-Apr-2004	0.04	2400-0200	2.0	11-Apr-2007	0.06	0400-0600	--
18-Apr-2004	0.07	1700-2000	1.0	13-Apr-2007	0.00	--	2.0
27-May-2004	0.06	2200-2400	1.5	14-Apr-2007	0.29	0600-2100	--
28-May-2004	0.08	2400-0600	2.3	3-May-2007	0.06	2000-2300	2.66
18-Sep-2004	0.00	--	2.0				

11. As reported in the June and July 2006 DSMRs, failure of the power supply to the continuous data logger resulted in the loss of metered million-gallon pond electrical conductivity and pH data. Failure to continuously monitor for these parameters is a violation of the Industrial Wastewater Monitoring section of Monitoring and Reporting

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Program (MRP) No. R5-2002-0148.

12. MRP No. R5-2002-0148 requires weekly monitoring of BOD₅, nitrates as nitrogen, total Kjeldahl nitrogen, fixed dissolved solids, total dissolved solids, sodium, and chloride on a weekly basis from the million-gallon pond. No results were reported for the million-gallon pond for these constituents for week ending 3 December 2005. Failure to monitor at the required frequency is a violation of MRP No. R5-2002-0148.
13. MRP No. R5-2002-0148 requires daily monitoring of freeboard, dissolved oxygen, dissolved sulfide, and pH for the million-gallon pond and 84-million gallon reservoir. Results for these parameters in the million-gallon pond were not reported for 21 days in 2002, 111 days in 2003; 29 days in 2004, 37 days in 2006, and 9 days in 2007, out of 1,758 required monitoring days. Results for these parameters in the 84-million gallon reservoir were not reported for 23 days in 2002, 111 days in 2003; 30 days in 2004, 34 days in 2006, and 9 days in 2007, out of 1,702 required monitoring days. In addition, no million-gallon pond dissolved oxygen results were reported for 10, 11, and 14 through 18 October 2002. Failure to monitor at the required frequency is a violation of MRP No. R5-2002-0148.
14. MRP No. R5-2002-0148 requires, in the second paragraph of Land Application Area Monitoring, the following:

"By 1 October 2002, the Discharger shall install a sufficient number of meters to continuously monitor the flow out of the settling/storage ponds to the land application areas. No wastewater shall be applied without metering. If portable pumps are used to discharge wastewater to the land application area or a storage pond, additional meters shall be installed at every discharge point."

The monthly monitoring reports reviewed state (in the Calculation Methods note to the BOD and Nitrogen Loading Log Book) that the "GPF [gallons per field] is calculated by multiplying sprinkler minutes by the sprinkler output rating at our operating pressure. For 95 acres, output is approximately 8.5 gpm, for lower acreage output is approximately 4.5 gpm [sic] Sections 95-01, 03, 05, 06, and 19 output is now 4.5 gpm".

The Discharger's failure to use meters to measure flow to the application areas, as confirmed during the 12 October 2006 inspection, is a violation of WDRs Order No. R5-2002-0148.

15. WDRs Order No. R5-2002-0148 includes Provision G.4, which requires compliance with *Standard Provisions and Reporting Requirements for Waste Discharge Requirements*, dated 1 March 1991 (Standard Provisions). Standard Provision B.1 states, in part, the following:

"In the event the discharger does not comply or will be unable to comply with any prohibition or limitation of this Order for any reason, the discharger shall notify the Board

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by telephone...as soon as it or its agents have knowledge of such noncompliance or potential for noncompliance, and shall confirm this notification in writing within two weeks. The written notification shall state the nature, time and cause of noncompliance, and shall include a timetable for corrective actions."

Written and verbal notification of Regional Water Board staff regarding violations has, with the exception of the monthly monitoring report transmittal letters, generally not occurred for at least the period reviewed. Failure to notify Regional Water Board staff in accordance with Standard Provision G.4 is a violation of WDRs Order No. R5-2002-0148.

16. Cleanup and Abatement Order No. R5-2002-0149 includes interim limitations and a time schedule to comply with the TDS limitation of 2,047 mg/l contained in WDRs Order No. R5-2002-0148. Interim TDS limitations contained in the CAO were exceeded on 172 occasions, out of a possible 252 monitoring events.

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Date	Interim Limit (mg/l)	TDS (mg/l)	Date	Interim Limit (mg/l)	TDS (mg/l)	Date	Interim Limit (mg/l)	TDS (mg/l)
20-Aug-2003	4,700	4,870	9-Feb-2005	2,047	3,240	2-May-2006	2,047	4,850
3-Sep-2003	4,700	5,460	14-Feb-2005	2,047	4,025	11-May-2006	2,047	4,480
11-Sep-2003	3,373	3,930	23-Feb-2005	2,047	3,101	22-May-2006	2,047	3,040
17-Sep-2003	3,373	4,200	28-Feb-2005	2,047	4,000	1-Jun-2006	2,047	2,490
24-Sep-2003	3,373	4,670	8-Mar-2005	2,047	4,540	5-Jul-2006	2,047	5,820
1-Oct-2003	3,373	3,590	14-Mar-2005	2,047	6,010	10-Jul-2006	2,047	4,300
8-Oct-2003	3,373	4,820	21-Mar-2005	2,047	4,620	19-Jul-2006	2,047	6,220
22-Oct-2003	3,373	3,570	28-Mar-2005	2,047	5,330	24-Jul-2006	2,047	3,850
5-Nov-2003	3,373	3,560	4-Apr-2005	2,047	3,390	2-Aug-2006	2,047	4,580
12-Nov-2003	3,373	4,510	11-Apr-2005	2,047	3,900	9-Aug-2006	2,047	3,990
19-Nov-2003	3,373	4,150	18-Apr-2005	2,047	3,090	17-Aug-2006	2,047	3,800
10-Dec-2003	3,373	3,865	25-Apr-2005	2,047	2,950	23-Aug-2006	2,047	5,570
22-Dec-2003	3,373	3,400	2-May-2005	2,047	4,040	31-Aug-2006	2,047	5,380
7-Jan-2004	3,373	4,650	11-May-2005	2,047	2,580	5-Sep-2006	2,047	5,060
14-Jan-2004	3,373	3,810	16-May-2005	2,047	4,310	13-Sep-2006	2,047	4,360
21-Jan-2004	3,373	5,010	23-May-2005	2,047	3,800	26-Sep-2006	2,047	3,730
29-Jan-2004	3,373	4,620	2-Jun-2005	2,047	5,800	4-Oct-2006	2,047	4,580
5-Feb-2004	3,373	4,210	8-Jun-2005	2,047	2,820	10-Oct-2006	2,047	4,520
10-Feb-2004	3,373	5,200	13-Jun-2005	2,047	3,820	19-Oct-2006	2,047	3,360
19-Feb-2004	3,373	4,750	22-Jun-2005	2,047	3,560	27-Oct-2006	2,047	4,450
4-Mar-2004	3,373	3,570	30-Jun-2005	2,047	3,670	2-Nov-2006	2,047	4,300
11-Mar-2004	3,373	3,965	7-Jul-2005	2,047	3,870	8-Nov-2006	2,047	3,310
18-Mar-2004	3,373	4,830	12-Jul-2005	2,047	4,710	15-Nov-2006	2,047	3,550
25-Mar-2004	3,373	3,800	21-Jul-2005	2,047	4,160	21-Nov-2006	2,047	4,000
8-Apr-2004	3,373	4,190	29-Jul-2005	2,047	3,740	29-Nov-2006	2,047	3,470
15-Apr-2004	3,373	4,560	5-Aug-2005	2,047	3,470	6-Dec-2006	2,047	3,090
22-Apr-2004	3,373	3,990	11-Aug-2005	2,047	2,650	13-Dec-2006	2,047	3,030
29-Apr-2004	3,373	3,510	17-Aug-2005	2,047	5,150	20-Dec-2006	2,047	2,080
6-May-2004	3,373	4,210	24-Aug-2005	2,047	3,070	27-Dec-2006	2,047	2,600
20-May-2004	3,373	4,720	31-Aug-2005	2,047	3,380	4-Jan-2007	2,047	4,670

ATTACHMENT B
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 MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
 SAN JOAQUIN COUNTY

Date	Interim Limit (mg/l)	TDS (mg/l)	Date	Interim Limit (mg/l)	TDS (mg/l)	Date	Interim Limit (mg/l)	TDS (mg/l)
9-Jun-2004	3,373	3,530	6-Sep-2005	2,047	4,770	10-Jan-2007	2,047	3,840
17-Jun-2004	3,373	4,545	15-Sep-2005	2,047	5,070	17-Jan-2007	2,047	2,860
25-Jun-2004	3,373	4,435	23-Sep-2005	2,047	5,190	24-Jan-2007	2,047	2,610
8-Jul-2004	3,373	4,720	30-Sep-2005	2,047	3,170	31-Jan-2007	2,047	3,240
15-Jul-2004	3,373	4,750	7-Oct-2005	2,047	3,200	7-Feb-2007	2,047	2,940
23-Jul-2004	3,373	5,760	10-Oct-2005	2,047	3,870	14-Feb-2007	2,047	3,380
29-Jul-2004	3,373	6,730	17-Oct-2005	2,047	3,130	21-Feb-2007	2,047	3,390
5-Aug-2004	3,373	5,460	24-Oct-2005	2,047	3,560	28-Feb-2007	2,047	2,380
18-Aug-2004	3,373	4,670	3-Nov-2005	2,047	3,390	7-Mar-2007	2,047	2,050
8-Sep-2004	2,047	4,360	10-Nov-2005	2,047	3,360	14-Mar-2007	2,047	2,460
13-Sep-2004	2,047	3,700	17-Nov-2005	2,047	3,750	21-Mar-2007	2,047	3,240
20-Sep-2004	2,047	4,500	23-Nov-2005	2,047	2,410	28-Mar-2007	2,047	3090
27-Sep-2004	2,047	4,650	6-Dec-2005	2,047	3,410	4-Apr-2007	2,047	2,850
4-Oct-2004	2,047	4,030	13-Dec-2005	2,047	3,390	11-Apr-2007	2,047	3,920
11-Oct-2004	2,047	4,630	12-Jan-2006	2,047	2,940	18-Apr-2007	2,047	3,810
18-Oct-2004	2,047	3,790	19-Jan-2006	2,047	2,840	25-Apr-2007	2,047	3,510
26-Oct-2004	2,047	4,440	25-Jan-2006	2,047	3,360	2-May-2007	2,047	3,410
1-Nov-2004	2,047	3,735	31-Jan-2006	2,047	2,930	10-May-2007	2,047	2,740
8-Nov-2004	2,047	4,790	9-Feb-2006	2,047	4,720	16-May-2007	2,047	2,810
15-Nov-2004	2,047	4,430	16-Feb-2006	2,047	2,990	23-May-2007	2,047	3,050
22-Nov-2004	2,047	2,100	22-Feb-2006	2,047	4,260	30-May-2007	2,047	3,170
29-Nov-2004	2,047	3,950	2-Mar-2006	2,047	4,920	6-Jun-2007	2,047	2,870
6-Dec-2004	2,047	4,140	7-Mar-2006	2,047	3,670	13-Jun-2007	2,047	3,000
28-Dec-2004	2,047	2,830	16-Mar-2006	2,047	3,350	20-Jun-2007	2,047	2,710
3-Jan-2005	2,047	3,280	24-Mar-2006	2,047	3,550	27-Jun-2007	2,047	2,150
10-Jan-2005	2,047	3,270	31-Mar-2006	2,047	4,400		2,047	
17-Jan-2005	2,047	3,460	7-Apr-2006	2,047	3,310		2,047	
24-Jan-2005	2,047	3,635	20-Apr-2006	2,047	3,020		2,047	
31-Jan-2005	2,047	2,620	24-Apr-2006	2,047	3,490		2,047	

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17. Cleanup and Abatement Order No. R5-2002-0149 includes interim limitations and a time schedule to comply with the sodium limitation of 597 mg/l contained in WDRs Order No. R5-2002-0148. Interim sodium limitations contained in the CAO were exceeded on 132 occasions, out of a possible 251 monitoring events.

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Date	Interim Limit (mg/l)	Sodium (mg/l)	Date	Interim Limit (mg/l)	Sodium (mg/l)	Date	Interim Limit (mg/l)	Sodium (mg/l)
26-Feb-2003	739	740	27-Sep-2004	597	1,003	10-Nov-2005	597	695
7-May-2003	739	778	4-Oct-2004	597	1,188	17-Nov-2005	597	787
14-May-2003	739	837	11-Oct-2004	597	1,446	6-Dec-2005	597	878
21-May-2003	739	879	18-Oct-2004	597	1,341	13-Dec-2005	597	836
28-May-2003	739	751	26-Oct-2004	597	826	22-Feb-2006	597	820
4-Jun-2003	739	776	1-Nov-2004	597	876	7-Mar-2006	597	717
3-Sep-2003	739	794	8-Nov-2004	597	920	31-Mar-2006	597	695
17-Sep-2003	668	684	15-Nov-2004	597	1068	2-May-2006	597	700

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 MUSCO FAMILY OLIVE COMPANY AND THE STUDLEY COMPANY
 SAN JOAQUIN COUNTY

Date	Interim Limit (mg/l)	Sodium (mg/l)	Date	Interim Limit (mg/l)	Sodium (mg/l)	Date	Interim Limit (mg/l)	Sodium (mg/l)
24-Sep-2003	668	800	29-Nov-2004	597	824	11-May-2006	597	624
1-Oct-2003	668	703	10-Jan-2005	597	689	22-May-2006	597	611
8-Oct-2003	668	773	17-Jan-2005	597	610	20-Jun-2006	597	610
22-Oct-2003	668	674	24-Jan-2005	597	658	5-Jul-2006	597	779
29-Oct-2003	668	740	31-Jan-2005	597	780	10-Jul-2006	597	992
5-Nov-2003	668	809	9-Feb-2005	597	794	19-Jul-2006	597	733
12-Nov-2003	668	906	14-Feb-2005	597	926	24-Jul-2006	597	697
19-Nov-2003	668	859	23-Feb-2005	597	908	2-Aug-2006	597	758
7-Jan-2004	668	674	28-Feb-2005	597	680	9-Aug-2006	597	916
14-Jan-2004	668	759	8-Mar-2005	597	1,046	17-Aug-2006	597	799
21-Jan-2004	668	729	14-Mar-2005	597	1,092	23-Aug-2006	597	751
29-Jan-2004	668	739	21-Mar-2005	597	679	31-Aug-2006	597	932
5-Feb-2004	668	826	28-Mar-2005	597	1,212	5-Sep-2006	597	870
10-Feb-2004	668	1,080	4-Apr-2005	597	729	26-Sep-2006	597	913
19-Feb-2004	668	797	11-Apr-2005	597	824	4-Oct-2006	597	848
4-Mar-2004	668	690	25-Apr-2005	597	763	10-Oct-2006	597	652
11-Mar-2004	668	679	2-May-2005	597	676	19-Oct-2006	597	613
18-Mar-2004	668	702	16-May-2005	597	761	15-Nov-2006	597	883
6-May-2004	668	686	23-May-2005	597	640	21-Nov-2006	597	653
13-May-2004	668	776	2-Jun-2005	597	723	29-Nov-2006	597	773
20-May-2004	668	797	13-Jun-2005	597	748	13-Dec-2006	597	704
9-Jun-2004	668	803	22-Jun-2005	597	615	4-Jan-2007	597	779
17-Jun-2004	668	994	12-Jul-2005	597	683	10-Jan-2007	597	705
30-Jun-2004	668	813	21-Jul-2005	597	675	31-Jan-2007	597	618
8-Jul-2004	668	808	5-Aug-2005	597	653	21-Feb-2007	597	645
15-Jul-2004	668	964	11-Aug-2005	597	626	28-Mar-2007	597	677
23-Jul-2004	668	713	17-Aug-2005	597	800	4-Apr-2007	597	646
29-Jul-2004	668	1,074	6-Sep-2005	597	871	11-Apr-2007	597	858
5-Aug-2004	668	909	15-Sep-2005	597	766	18-Apr-2007	597	1,170
13-Aug-2004	668	964	23-Sep-2005	597	885	25-Apr-2007	597	789
18-Aug-2004	668	1,075	30-Sep-2005	597	614	2-May-2007	597	856
25-Aug-2004	668	930	7-Oct-2005	597	714	10-May-2007	597	603
1-Sep-2004	668	1,047	10-Oct-2005	597	797	16-May-2007	597	626
8-Sep-2004	597	893	17-Oct-2005	597	774	23-May-2007	597	662
13-Sep-2004	597	790	24-Oct-2005	597	788	30-May-2007	597	729
20-Sep-2004	597	976	3-Nov-2005	597	660	6-Jun-2007	597	644

18-Sep-07

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